

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA

v.

MICHAEL NOWAK,

Defendant.

Case No. 19-cr-00669

Hon. Edmond E. Chang

**MICHAEL NOWAK’S UNOPPOSED MOTION FOR LEAVE TO FILE PORTIONS OF  
SENTENCING MEMORANDUM AND EXHIBIT A TO SAME UNDER SEAL**

Michael Nowak, through his undersigned counsel, respectfully moves this Court for leave to file under seal sensitive information contained in the Sentencing Memorandum on Behalf of Michael Nowak (“Sentencing Memo”) and Exhibit A to the same. As grounds for this motion, counsel for Mr. Nowak states the following:

1. The Sentencing Memo contains the names of Mr. Nowak’s children (ages 15, 16, and 19), excerpts of the letters of support written by his children, and excerpts from other letters that contain sensitive personal information regarding the letter writers.
2. Exhibit A to the Sentencing Memo comprises letters of support written by Mr. Nowak’s family, friends, and former colleagues. It contains references to Mr. Nowak’s children’s names, the letters written by his children, personal photos, information regarding the child Mr. Nowak tutors, and sensitive information regarding several letter writers (e.g., personal addresses, phone numbers, and health information).
3. Sealing the information described above is warranted to protect personal data.

4. Undersigned counsel has conferred with counsel for the government, and counsel for the government has indicated that it does not object to this motion.

5. Pursuant to Local Rule 26.2(c), undersigned counsel will provisionally file the Sentencing Memo and Exhibit A to the same under seal and will publicly file versions from which the sensitive information described above has been redacted.

Dated: April 10, 2023

Respectfully submitted,

/s/ David Meister

David Meister

Chad E. Silverman

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